

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
1 CONGRESS STREET, SUITE 1100 (HBT)
BOSTON, MASSACHUSETTS 02114-2023

November 24, 1999

Mr. Emil Klawitter (eeklawitter@efdnorth.navfac.navy.mil)
Northern Division, Naval Facilities Engineering Command
Code 1823/EK
10 Industrial Highway, Mailstop 82
Lester, PA 19113-2090

Re: Navy Response to EPA Comments on the Draft 1998 Annual Monitoring Report for Sites 1, 3 and the Eastern Plume, Naval Air Station, Brunswick, Maine

Dear Mr. Klawitter:

We appreciated the opportunity to explain our significant and substantive comments to the 1998 monitoring report at the meeting held at EA's Bedford, MA offices this week. Per our discussions, we acknowledge that many of our comments address core issues of remedy effectiveness and possible extent of the plume which are better addressed in the 5 year review and are beyond the current scope of the annual monitoring reports.

As such we would like to defer many of our more significant comments to the 5 year review; these are denoted on the attached spreadsheet. To further expedite the process of finalizing the 1998 report, we have broken out our comments into several categories on the attached spreadsheet:

- Navy response requested, leave draft 98 report as is, request change in future reports.
- Navy response requested, request revising draft 98 report.
- Expect Navy response of "noted" because the comment was an observation, is overcome by events, or we feel mention in EPA comments is sufficient.
- Editorial/typo comments.

To improve the comment/response process we are in favor of trying many of the ideas suggested at the meeting such as shifting to a biannual report, providing brief "bullet" comments to discussed at a meeting and EPA/DEP providing "alternate" interpretations of figures. If you have any questions, please contact me at 617-918-1344 or barry.michael@epa.gov.

Sincerely,

(Signed, 11/24/99 at 12:27 pm)
Michael S. Barry
Remedial Project Manager
Federal Superfund Facilities Section

cc. Carolyn LePage/LePage Environmental (clepagegeo@aol.com)
Pete Nimmer/EA Environmental (pln@eaest.com)
Claudia Sait/ME DEP (claudia.b.sait@state.me.us)
Tony Williams/NASB (WilliamsA@nasb.navy.mil)

Resolution of EPA Comments to 1998 LTM Report
 Expected Navy Response and/or willing to defer to/expected action
 EPA Letter of 7/29/99

CODE	1. ref to 11/22-23 mtg & defer comment 5 yr rev	2 Noted, comment OBE	3 Noted, comment is observation	4 Req Response desire change in final 98 report	5 Req response, but 98 draft report ok - want change in 99/ME 16 report	6 editorial comment req change	general comment numbers	specific comment numbers	notes
General #									
1	1							27	
2	1							2, 7, 16	
3		2						6, 8, 15, 20	
4				4	5			9	resolve in tech mtg/EPA provide fig?
5				4	5			12, 26	resolve in tech mtg/EPA provide fig?
6	1							27, 28, 30	
7			3					none	
count	3	1	1	2	2	0			
Recs									
1	1						1		
2	1						2, 3a-d		
3	3						3e, 4		
4		2							
5	1						5		
count	4	1	0	0	0	0			
Specific #									
1						8	n/a		
2	1						2		
3			3				n/a		
4			3				n/a		
5						6	n/a		
6			3				3		EP comment sufficient
7	1						2		good new deep EW location
8		2					3		
9				4	5		4		resolve in tech mtg/EPA provide fig?
10			3				n/a		EPA comment sufficient
11			3				n/a		Navy discretion!
12				4	5		5		resolve in tech mtg/EPA provide fig?
13			3				n/a		comment type, mcl low rel to plume
14						8	n/a		wrong MW ref?
15			3				3		epa comment sufficient
16			3				2		EPA comment sufficient
17			3				n/a		EPA comment sufficient
18						6	n/a		
19			3				n/a		
20		2					3		
21			3				n/a		
22			3				n/a		
23				4	5		n/a		98 report if possible
24				4	5		n/a		98 report if possible
25						6	n/a		
26				4	5		5		resolve in tech mtg/EPA provide fig?
27	1						1, 6		
28	1						6		
29					5		n/a		
30	1						6		
count	5	2	12	5	6	5			

- Note: 1. Duplicate response on general comments 4, 5 and specific comments 9, 12, 23, 24, 26; EPA flexible on resolving in 98 or future reports
 2. On 8/31/99 supplemental comment letter, DNAPL concerns can be deferred to the 5 yr review, the rest of the letter is more info and can be noted/deferred to 5 yr review